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**From:** Lustberg, Lawrence S <LLustberg@gibbonslaw.com>  
**Sent:** Thursday, January 19, 2023 4:43 PM  
**To:** Thomas, Andrew (USANYS); Haggerty, Timothy; Valen, Thomas R.; Mulligan, Mary; Nagel, Jeffrey L.; Reich, Kevin R.  
**Cc:** Sassoon, Danielle (USANYS); Rossmiller, Alexander (USANYS); Podolsky, Matthew (USANYS)  
**Subject:** RE: US v. Hwang, Halligan - USA Motion Opposition Filings

Thank you, Andrew – I appreciate the response and at first blush this looks reasonable. But let us discuss a bit and get back to you.

Best regards,

Larry

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**From:** Thomas, Andrew (USANYS) <Andrew.Thomas2@usdoj.gov>  
**Sent:** Thursday, January 19, 2023 4:37 PM  
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**Cc:** Sassoon, Danielle (USANYS) <Danielle.Sassoon@usdoj.gov>; Rossmiller, Alexander (USANYS) <Alexander.Rossmiller@usdoj.gov>; Podolsky, Matthew (USANYS) <Matthew.Podolsky@usdoj.gov>  
**Subject:** RE: US v. Hwang, Halligan - USA Motion Opposition Filings

Hi Larry,

On a potential pretrial schedule, we propose the following:

(T – x refers to x weeks before trial)

T-9: Parties exchange expert disclosures (exclusive of rebuttal experts, if any)  
T-7: Daubert motions, if any  
T-7: Parties exchange exhibits (identified as of that date, exclusive of purely impeachment material)  
T-7: Good faith effort to finalize routine stipulations (e.g., authenticity)  
T-7: Rule 404(b) notice (for evidence known to the Government as of that time)  
T-6: Government produces 3500 & *Giglio* material

T-6: Motions *in limine*  
T-5: Oppositions to any Daubert motions  
T-5: Proposed requests to charge, voir dire, verdict form  
T-3: Defense Rule 26.2 material  
T-3: Parties exchange preliminary witness lists  
T-3: Oppositions to motions *in limine*  
T-1: Final pretrial conference

We are, of course, open to reasonable counterproposals or tweaks on any of these items, and, when this gets reduced to actual calendar dates, we may need to work around holidays.

On the trade and market data call, it may be more productive at this point to speak shortly after the motions conference. Your email on the trade and market data requests has given us some specific avenues to consider and we should be in a more informed position to address your requests soon.

We will get you the overlays you requested.

Andrew

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**Subject:** [EXTERNAL] RE: US v. Hwang, Halligan - USA Motion Opposition Filings

Thank you for sending Andrew – we appreciate that courtesy. Also, now that this is filed, and per my email to you of December 22 (attached), let us know when you want to have a broader discussion of the data issues raised in that letter, as well as scheduling (about which you write me on December 2. Thanks and Happy New Year to all of you.

Larry

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**Subject:** US v. Hwang, Halligan - USA Motion Opposition Filings

Counsel—

Please find enclosed a PDF set of the Government's filings in response to your various pretrial motions.

Sincerely,

Andrew Thomas  
Assistant United States Attorney  
212-637-2106

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